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FILED
DISTRICT COURT OF GUAM

FEB - 9 2007 mba

MARY L.M. MORAN
CLERK OF COURT

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF GUAM**

16 NANYA TECHNOLOGY CORP. AND
17 NANYA TECHNOLOGY CORP. U.S.A.,

Case No. CV-06-00025

18 Plaintiffs,

19 **CERTIFICATE OF SERVICE**

20 v.

21 FUJITSU LIMITED AND FUJITSU
MICROELECTRONICS AMERICA, INC.,

22 Defendants.

23
24 I, JOSEPH C. RAZZANO, ESQ., hereby declare as follows:

25 1. I am over the age of majority and am competent to testify regarding the matters stated
herein.

26
27 2. I hereby certify that on February 9, 2007, a true and exact copy of **PLAINTIFFS'**
28

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1 parties failed to reach an agreement.¹⁰ Plaintiffs subsequently filed a motion with the Court requesting
 2 the Court enter a protective order before any documents are exchanged.¹¹ Further, the objection that
 3 such information is not likely to produce admissible evidence is completely inaccurate because the
 4 requested documents would demonstrate that Defendants are subject to this Court's jurisdiction.
 5 Defendants' duplicative objections that such requests are irrelevant, overly broad, unduly burdensome,
 6 and vague and ambiguous are again improper, evasive and objectively unreasonable.

8 The combination of Defendants' objections to these categories of documents and the preceding
 9 outlined categories and Defendants' failure to submit any affidavits or evidence substantiating these
 10 objections simply establish their obstructionist, boilerplate, and frivolous nature. The Court should not
 11 countenance such abusive discovery tactics.

12 **IV.**

13 **CONCLUSION**

15 Because of FMA's unwillingness to provide substantive responses to Plaintiffs' discovery
 16 requests, Plaintiffs file this supplement respectfully requesting that the Court overrule FMA's
 17 objections and compel FMA to provide substantive responses to Plaintiffs' discovery requests.

19 Dated: February 9, 2007

TEKER TORRES & TEKER, P.C.

20 By: 
 21 **JOSEPH C. RAZZANO, ESQ.**
 22 *Attorneys For Plaintiffs*
 23 *Nanya Technology Corp. and*
Nanya technology Corp. U.S.A.

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 26
¹⁰ See Exhibit C, Letters from Michael Murray to Alfonso Chan.

27
 28 ¹¹ It was only after several letters and after Plaintiffs' requested deadline did Defendants provide comments to Plaintiffs regarding the proposed protective order. By that time, after several weeks of waiting for Defendants' comments, Plaintiffs had already sought assistance from the Court.